

EXHIBIT “P”

From: GARY LIGHTMAN garylighman@lightmanlaw.com

Subject: Fwd: Zekaria Deposition 5/28/24

Date: May 22, 2024 at 11:07 PM

To: Patrick Healey phealey@rebarkelly.com

Cc: Kim DiTomaso kditomaso@lightmanlaw.com, Glenn Manochi gmanochi@lightmanlaw.com, GARY LIGHTMAN ltag8r@me.com

G

Patrick,

We have afforded you every courtesy, but our patience is at an end.

If we don't **receive** the February 2022 Zekaria retainer/escrow agreement **by tomorrow**, then (1) we will proceed with the Zekaria deposition on May 28, as re-scheduled in accordance with the Rules of Court, absent a Court Order to the contrary; and (2) we will be filing a Motion for Contempt, and (3) we will be filing a second Motion for Contempt, due to Zekaria's failure to produce all responsive documents and full and complete answers without objection to plaintiff's discovery requests served on the Zekaria Defendants, including the February 2022 Zekaria retainer/escrow agreement. We will be filing said Motions asap, which will force you to file a response prior to the 6/13 hearing on your Motion to Withdraw.

All of that can be avoided simply by producing for us, **by tomorrow**, the February 2022 Zekaria retainer/escrow agreement.

If Zekaria can't (or claims she can't) locate the physical paper February 2022 retainer/escrow agreement that Zekaria swore under oath in her deposition that she printed out and has somewhere among the documents in her office, then just have her print out another copy of it from her phone or computer, and email it to us, or even better, just forward Zekaria's email or text with the attached draft that she sent to Gary Weiss, to us directly. If she cannot or will not do that, then contact us, asap, so we can make arrangements for an IT technician to examine Zekaria's phone and computer for that document, as well as for the other responsive documents that the Court ordered her to produce, which to date she has not produced.

Your choice. Produce the doc by tomorrow, and we will agree to re-schedule the 5/28 depo, and wait until the 6/13 hearing to file contempt motions. Or else Zekaria will have several contempt motions to deal with (for refusing to appear for properly scheduled depositions and

to deal with (not needing to appear for properly conducted depositions, and for refusing to comply with court orders to produce all responsive discovery without objection, etc).

Your choice. We look forward to receiving an email from you by tomorrow.

thx

Gary Lightman
cell 215-760-3000

KDT, pls dy for 5/23 and send me draft of contempt motions to file on 5/24, if Healey doesn't send us the doc we want by 5/23 tg

Begin forwarded message:

From: GARY LIGHTMAN <garylighman@lightmanlaw.com>

Subject: Fwd: Zekaria Deposition 5/28/24

Date: May 15, 2024 at 9:26:53 AM EDT

To: Patrick Healey <phealey@rebarkelly.com>

SETTLEMENT COMMUNICATION

Patrick,

Notwithstanding our below email to you, and as we previously informed you, we do NOT wish to put you personally in an untenable position, vis-a-vis your representation of the Zekaria Defendants and your pending Motion to Withdraw (returnable on 6/13).

SO, if you (1) produce the February 2022 retainer/escrow agreement for us by Friday, *and* (2) give us firm dates between June 14-30 when Zekaria is available to be deposed, then we will agree to re-schedule the 5/28 deposition to one of those June dates.

pls lmk

thx

Gary Lightman
cell 215-760-3000

PS, Zekaria should be searching for replacement counsel, **now** — is she looking for replacement counsel? Does she need some names of potential replacement attorneys? pls lmk thx

Begin forwarded message:

From: GARY LIGHTMAN <garylighman@lightmanlaw.com>
Subject: Re: Zekaria Deposition 5/28/24
Date: May 15, 2024 at 9:17:14 AM EDT
To: Patrick Healey <phealey@rebarkelly.com>
Cc: "Laver, Seth L." <slaver@goldbergsegalla.com>, Joseph Ross <jross@goldbergsegalla.com>, Gary Weiss <wgary4109@gmail.com>, sam gross <charltonholdinggroupllc@aol.com>, Sam Gross <Scg1212@gmail.com>, Kim DiTomaso <kditomaso@lightmanlaw.com>, Glenn Manochi <gmanochi@lightmanlaw.com>, Cathleen Kelly Rebar <crebar@rebarkelly.com>, Kathy Ciesielka <kciesielka@rebarkelly.com>, Michael Rebar <mrebar@rebarkelly.com>, GARY LIGHTMAN <ltag8r@me.com>

Patrick,

In response to your below email:

You have continually failed to provide us with a date for Zekaria's deposition, despite repeated requests for you to give us available dates, forcing us to select the 5/14 deposition date on our own. And there is nothing improper in continuing with the lawsuit, notwithstanding your Motion to Withdraw. And you did just unilaterally fail to produce Zekaria for her deposition as properly scheduled on May 14, pursuant to the Rules of Court.

We have properly re-scheduled the Zekaria deposition for May 28, pursuant to the Rules of Court. If you want to move the 5/28 date of Zekaria's deposition, then (1) please tell us why Zekaria is not

Zekaria's deposition, then (1) please tell us why Zekaria is not available on 5/28, and (2) let us know which of the following dates work for her deposition: May 22, 23, 24, 30. Otherwise, we intend to move forward with the Zekaria deposition on 5/28 as scheduled, absent a Court Order to the contrary.

Please be guided accordingly.

thx
Gary Lightman
cell 215-760-3000

cc: all counsel/parties

On May 15, 2024, at 8:00 AM, Patrick Healey
<phealey@rebarkelly.com> wrote:

Gary:

Just to correct the misstatement that you have made. The Zekaria Defendants did not "fail to appear" for depositions on May 14, 2024. We had informed you on May 6, 2024 that we were unavailable for a for a deposition on May 14. Just because you unilaterally pick dates for depositions does not mean that others are necessarily available. We are also not available on May 28 for a deposition. Again, as we stated before, it is improper for you to schedule the depositions of the Zekaria defendants while our Motion to withdraw is pending and is scheduled for a hearing.

Pat Healey

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-----Original Message-----

From: Gary Lightman <garylighman@lightmanlaw.com>

Sent: Wednesday, May 15, 2024 12:03 AM

To: Patrick Healey <phealey@rebarkelly.com>

Cc: Laver, Seth L. <slaver@goldbergsegalla.com>; Joseph Ross
<jross@goldbergsegalla.com>; Gary Weiss

<wgary4109@gmail.com>; sam gross
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<ltag8r@me.com>
Subject: Zekaria Deposition 5/28/24

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We are pleased to announce that our New York office has
relocated, and therefore our address has changed.

Please note, our New York office address is now:

256 West 36th Street
Suite 900
New York, NY 10018

—
Gary Lightman, Esquire
LIGHTMAN & MANOCHI
cell: 215-760-3000
email: garylighman@lightmanlaw.com and Ltag8r@me.com

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